

REMARKS

This responds to the Office Action mailed on May 4, 2005.

Claims 1, 25, and 36 are amended. No claims are cancelled or added. As a result, claims 1-61 remain pending in this patent application.

§102 Rejection of the Claims

Claims 1-7, 11, 25-28 and 31 were rejected under 35 U.S.C. § 102(e) for anticipation by Abu-Hakima (U.S. 6,823,331 B1). As an initial note, Applicant reserves the right to swear behind this or any other § 102(e) references, as provided under 37 C.F.R. § 1.131. Applicant respectfully traverses this rejection.

Concerning claims 1-7 and 11:

As an initial note, these claims recite concepts embodied in a knowledge map to which documents are tagged, as illustrated in Fig. 2 of the present patent application. This permits multiple documents 201 to be tagged to one or more concepts 205 in the knowledge map 200, and each concept 205 in the knowledge map 200 can have various documents 201 tagged to it, as illustrated in Fig. 2 of the present patent application.

Applicant cannot find in the cited portions of Abu-Hakima, among other things, any disclosure of a plurality of concepts in a knowledge map (instead of concepts in the documents themselves), in which each concept includes at least one concept feature that is also found in at least one document in a plurality of documents that are tagged to one or more of the concepts, as recited or incorporated in these claims. As the present patent specification explains,

In one example . . . every concept corresponds to at least one document that includes at least one of its concept features.

(Application at page 17, lines 13-15; *see also* Application at page 66, lines 25-26.) The cited portion of Abu-Hakima merely states:

A single document may comprise text relating to more than one concept (i.e. a multi-concept document) but its primary concept is identified from the overall weights calculated for each concept. For example, this patent specification document comprises text related to porn, women's health products and technical reference concepts but the overall weights calculated for each concept show that it is primarily a technical reference document. For purposes of illustration an

example of a document map, and its associated word stem map, is presented in Table A at the end of this description.

(Abu-Hakima at col. 6, lines 15-24.) While the cited passage from Abu-Hakima apparently notes that a document can have more than one concept, it apparently does not disclose concepts in knowledge map (rather than concepts in the documents) in which each concept in the knowledge map includes at least one tagged document in the plurality of documents.

Because the cited portions of Abu-Hakima do not disclose all elements of claims 1-7 and 11, Applicant respectfully requests withdrawal of this basis of rejection of these claims. For brevity, Applicant defers (but reserves the right to present) further remarks, such as concerning the dependent claims, which are believed separately patentable.

Concerning claims 25-28 and 31:

Applicant cannot find in the cited portions of Abu-Hakima, among other things, any disclosure of presenting to the user (1) an indication of at least one matched concept in a knowledge map of concepts to which documents are tagged, (2) an indication of at least one related concept to the at least one matched concept in the knowledge map of concepts, and (3) an indication of at least one document that corresponds to the at least one matched concept, as recited or incorporated in these claims. Instead, the cited portions of Abu-Hakima apparently disclose presenting key concepts within a particular document (*see, e.g.*, Abu-Hakima at col. 3, lines 1-9), instead of presenting a matched concept in a knowledge map to which documents are tagged, a related concept to the matched concept in the knowledge map, and an indication of a document tagged to the matched concept.

Because the cited portions of Abu-Hakima do not disclose all elements of claims 25-28 and 31, Applicant respectfully requests withdrawal of this basis of rejection of these claims. For brevity, Applicant defers (but reserves the right to present) further remarks, such as concerning the dependent claims, which are believed separately patentable.

§103 Rejection of the Claims

1. Claims 8-10 and 29-30 were rejected under 35 U.S.C. § 103(a) for obviousness over Aggarwal et al. (U.S. Publication No. 2002/0138481 A1). As a first initial note, Applicant

reserves the right to swear behind Aggarwal et al. as provided under 37 C.F.R. § 1.131. As a second initial note, Applicant notes that this rejection also apparently relies on Abu-Hakima, which was discussed above.

Applicant respectfully traverses this rejection. Applicant respectfully submits that no *prima facie* case of obviousness presently exists for these dependent claims because all elements of their respective independent base claims 1 and 25 are not found in the cited portions of Abu-Hakima (as discussed above with respect to the § 102 rejection), and Applicant cannot find anything in the cited portions of Aggarwal et al. that provides the missing claim elements discussed above. Accordingly, Applicant respectfully requests withdrawal of this basis of rejection of these claims. For brevity, Applicant defers (but reserves the right to present) further remarks, such as concerning the dependent claims, which are believed separately patentable.

2. Claims 36-42 were rejected under 35 U.S.C. § 103 for obviousness over Abu-Hakima (U.S. 6,823,331 B1). As an initial note, Applicant reserves the right to swear behind Abu-Hakima as provided under 37 C.F.R. § 1.131. Nonetheless, Applicant respectfully traverses this rejection.

Applicant respectfully submits that no *prima facie* case of obviousness presently exists with respect to these claims because all elements are not present in Abu-Hakima, for as discussed above with respect to the § 102 rejection.

First, Applicant cannot find in the cited portions of Abu-Hakima any disclosure, teaching, or suggestion of a plurality of concepts in a knowledge map (instead of concepts in the documents themselves), in which each concept includes at least one concept feature that is also found in at least one document in a plurality of documents that are tagged to one or more of the concepts, as recited or incorporated in these claims. As discussed above, although the cited portions of Abu-Hakima apparently notes that a document can have more than one concept, it apparently does not disclose concepts in knowledge map (rather than concepts in the documents) in which each concept in the knowledge map includes at least one tagged document in the plurality of documents. (*See* Abu-Hakima at col. 6, lines 15-24.)

Second, Applicant cannot find in the cited portions of Abu-Hakima any disclosure, teaching, or suggestion of presenting to the user (1) an indication of at least one related concept

to the at least one matched concept in the knowledge map of concepts, and (2) an indication of at least one document that corresponds to the at least one matched concept, as recited or incorporated in these claims. Instead, the cited portions of Abu-Hakima apparently disclose presenting key concepts within a particular document (*see, e.g.*, Abu-Hakima at col. 3, lines 1-9), instead of presenting a related concept to a matched concept in a knowledge map to which documents are tagged, and an indication of a document tagged to the matched concept.

Third, with respect to the claimed “Activities,” “Symptoms,” “Products,” and “Objects” groups, Applicant respectfully disagrees with the Office Action’s position that it would have been obvious to assign different headings to primary concept groups since it is known in the database art that concept groups are user definable. In the present case, the particular “Activities,” “Symptoms,” “Products,” and “Objects” groups amount to more than a mere arbitrary classification of concepts. Instead, these groups were particularly selected because of the particularly meaningful relationships between these groups. In one example, the nature of the relationship between the “Activities” and “Objects” groups is particularly useful to suggest a suitable “related concept” from one of these groups to a “matched concept” from the other, for example, as recited in claim 37. This and other examples are explained in the present specification in detail. (*See, e.g.*, Application at page 21, line 26 through page 22, line 4.)

In sum, because Applicant cannot find all elements in the present claims 36-42 in the cited portions of Abu-Hakima, Applicant respectfully submits that no *prima facie* case of obviousness presently exists with respect to these claims. Accordingly, Applicant respectfully requests withdrawal of this basis of rejection of these claims.

CONCLUSION

Applicant respectfully submits that the claims are in condition for allowance, and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney at (612) 373-6951 to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

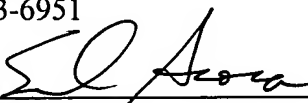
Respectfully submitted,

MAX COPPERMAN ET AL.


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Date Sept. 2, 2005

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CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail, in an envelope addressed to: Mail Stop Amendment, Commissioner of Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on this 2 day of September, 2005.



Name



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